

**NAVAL WAR COLLEGE**  
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STANDING NAVAL FORCE MEDITERRANEAN OPERATIONS in support of  
OPERATION ALLIED FORCE: A QUALITATIVE REVIEW FOR THE JOINT  
TASK FORCE COMMANDER

by

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A paper submitted to the Faculty of the Naval War College in partial satisfaction of the requirements of the Department of Joint Military Operations.

The contents of this paper reflect my own personal views and are not necessarily endorsed by the Naval War College or the Department of the Navy.

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## **ABSTRACT**

U. S. military forces have been employed in various mediums throughout history. Rarely has the United States committed forces unilaterally. The U.S. National Security Strategy and the expanding global interests of our Nation dictate that our military forces will be engaged in alliance and coalition operations. With the reduction of overseas ground base presence, naval forces play an increasingly critical role in maintaining allegiance with our Allies. Multinational operations will continue to be the most common method for employment of NATO and U.S. forces. However, conducting military operations in an alliance or coalition setting is difficult. Effective combined operations require a high degree of interoperability. To minimize the associated risks of operating in a multinational venue, the Joint Task Force Commander must factor in the underlying elements of command and control, doctrine, training, and interoperability when planning. This paper provides a qualitative review of the employment of NATO's maritime component, Standing Naval Force Mediterranean, in Operation Allied Force. It identifies the factors that contributed to interoperability issues that degraded operational readiness,

and suggests potential areas where beneficial changes can be made.

## I. INTRODUCTION

The end of the Cold War era has accelerated the drawdown of U.S. and NATO forces while concurrently increasing the risk of regional conflicts. The U.S. National Military Strategy states:

*[T]hat while we maintain the unilateral capability to wage decisive campaigns to protect U.S. and multinational security interests, our armed forces will most often fight in concert with regional allies and friends, as coalitions can decisively increase combat power and lead to a more rapid and favorable outcome to the conflict.<sup>1</sup>*

Operating in *adhoc* coalitions with non-traditional allies increasingly will characterize tomorrow's conflicts. To oppose the threats of the Twenty-First Century, the requirement for a fully multinational operational force is critical. Contingency planning for regional crises such as Operations Desert Shield/Storm requires short-notice response and thus a higher state of Fleet readiness.

The shift in threat from global to regional scenarios highlights the necessity for an increased understanding of the complexities of Alliance and coalition warfare. Multinational naval forces may operate under a unified commander or their own national commanders. The effectiveness of multinational operations depends greatly on the ability of the commander to achieve unity of effort

among assigned military forces. To be effective the multinational naval operational commander must factor in the following underlying elements of coalition operations when planning: Unity of Effort, Command and Control, Doctrine, and Interoperability. The commander's success is underwritten by understanding multinational force dynamics.

In turn, this empowers the commander's staff to develop plans that minimize or eliminate points of confusion and/or disagreement among the various national participants.

Application of this ethic to issues of interoperability, doctrine, and command and control is essential to achieving unity of effort.

This paper addresses NATO's maritime assets. Assignment and employment of these assets is cumbersome. It involves a web of policy, planning, and procedural responsibilities. A matrix of NATO nations and decision-makers at multiple levels drives the process. With "NATO's shift towards a new strategic concept of collective security,"<sup>2</sup> the effectiveness of multinational Immediate and Rapid Reaction Forces must be assessed. "It is widely thought throughout the U.S. Navy that multinational operations are difficult, inefficient, high risk, and interfere with Commanders' efforts to accomplish assigned missions."<sup>3</sup>

A qualitative review of the employment of Standing Naval Force Mediterranean (SNFM) in Operation Allied Force is presented in this paper. I will provide a basic background on interoperability issues that prevented SNFM from being employed effectively, and propose recommendations to mitigate the interoperability issues so that the Joint Task Force Commander can better integrate this force for future operations. Chapter II presents an introduction to NATO's Immediate Reaction Forces Maritime (IRF(M)) - Standing Naval Force Mediterranean. Chapter III constitutes an in-depth review of Standing Naval Force Mediterranean's role in Operation Allied Force (March-June 1999). Chapter IV identifies the problems of interoperability unique to Standing Naval Force Mediterranean.

## **II. NATO'S STANDING NAVAL FORCE MEDITERRANEAN**

"Forces available to NATO fall into three categories: Immediate and Rapid Reaction Forces, Main Defense Forces, and Augmentation Forces."<sup>4</sup> Immediate and Rapid Reaction Forces are versatile, highly mobile ground, air, and maritime assets maintained at high levels of readiness, and available on short notice for early military response to a crisis.

NATO's Standing Naval Force Mediterranean (STANAVFORMED), constituted in 1992, is one of two Immediate Reaction Forces Maritime (IRF(M) assigned to Allied Command Europe (ACE). It is the core of Supreme Allied Commander Europe's (SACEUR) multinational maritime response capability in periods of tension or limited aggression. "The mission of this standing force is to gain or exploit command of the sea, sea control or sea denial, and/or to project power from the sea. Maritime operations range from peacetime operations such as presence and surveillance, and humanitarian operations, through operations in times of tension."<sup>5</sup> It consists of Destroyer and Frigate type ships.

STANAVFORMED comprises vessels from various NATO nations that train and operate together as a collective whole under the Commander, Allied Naval Forces Southern Europe (COMNAVSOUTH). Flying the NATO flag, it is a flotilla of eight ships that provide a continuous maritime presence. Participating in a series of scheduled NATO and national exercises, it is a constant reminder of the solidarity and cohesiveness of the Alliance. Allies that contribute to the force are Germany, Italy, Greece, The Netherlands, Spain, Turkey, United Kingdom, and the United States.

STANAVFORMED routinely has participated in major exercises such as DYNAMIC MIX '98, STRONG RESOLVE '98, and in the Partnership for Peace (PFP). In October 1998, STANAVFORMED deployed to the Adriatic Sea as part of NATO preparations for contingency operations in the former Federal Republic of Yugoslavia. Because of renewed violence in Kosovo, the North Atlantic Council, in January 1999, decided to increase the capability of NATO forces to conduct air operations against the former Federal Republic of Yugoslavia. STANAVFORMED was deployed to the Adriatic Sea to increase Alliance presence in the area and demonstrate NATO's resolve.

### **III. OPERATION ALLIED FORCE**

#### Overview

"Operation Allied Force lasted for 78 days from March to June 1999. The United States and NATO engaged in a major military operation to bring an end to Serbian atrocities in Kosovo."<sup>6</sup> The Kosovo crisis had been building for a long time. Serbian forces challenged the peace and stability of the North Atlantic Region, and NATO was obligated to respond. NATO intervened to halt a humanitarian catastrophe and to reestablish stability in the region. "NATO's three primary objectives were to stabilize the Eastern Europe

region, to stop ethnic cleansing, and to ensure NATO credibility."<sup>7</sup>

The heart of the design for NATO's Kosovo campaign was a major combined air offensive operation. Operation Allied Force began on 24 March 1999 and ended with a cease-fire on 10 June 1999. "It was conducted in five phases: Phase 0: deployment of assets to the region; Phase 1: establish air superiority; Phase 2: attack military targets in Kosovo which provided reinforcement to Serbian forces; Phase 3: expand air operations against high value military and security force targets; and Phase 4: redeployment as required."<sup>8</sup> During this time, fourteen of nineteen NATO countries conducted air operations against Serbia to stop Slobodan Milosevic's ethnic cleansing campaign. Even though NATO's political leadership failed to articulate a clear and achievable end state, Kosovo was declared a NATO success by those leaders.

#### ROLE OF STANDING NAVAL FORCE MEDITERRANEAN

Allied Joint Doctrine, (AJP-01 (A)) states: "that the primary role of allied military forces is to guarantee the security and territorial integrity of member states. In operations, allied forces will act to complement and reinforce political action and are ultimately under

political control."<sup>9</sup> Accordingly, the commitment of NATO Reaction Forces for Allied Force required the recommendation of the Military Council to achieve approval by the Defense Planning Committee.

NATO was not organized, ready, manned, nor equipped to plan this contingency. NATO planners did not develop a series of major operations on the ground and sea; as a result, STANAVFORMED's role in Allied Force was limited. Mainly for political reasons, the NATO operational scheme did not provide for the optimal use of naval power to shape the area of operations.

STANAVFORMED was not employed to advertised capability. Deployed to the Adriatic Sea as an Immediate Reaction Force (IRF), it arrived on station but added no value to the campaign. As originally pledged, it was supposed to impose an embargo against the former Yugoslavia in April, but this never occurred. NATO decided that Montenegro's two main ports, Bar and Kotor Bay, would not be blockaded. While not readily apparent, Greece's solidarity with fellow Christian Orthodox Serbians may have influenced the decision not to use STANAVFORMED. Due to political factors, Greece, an active member of the Standing Naval Force during this time, had difficulty employing one of its units in Operation Allied Force.

Nevertheless, the other ships operated together and it became evident that even the most basic daily tactical evolutions were difficult to conduct. Given such minimal operational readiness, the question of SNFM's value to the Joint Task Force Commander remains. The next section will provide an analysis of those deficiencies that affected Standing Naval Force Mediterranean operations.

#### **IV. STANDING NAVAL FORCE MEDITERRANEAN INTEROPERABILITY ISSUES**

" 'Multinational operations' is a collective term to describe the military actions conducted by forces of two or more nations. Multinational can also be described as allied, alliance, bilateral, combined or coalition."<sup>10</sup>

The operational factor of force comprises a number of ingredients that "are physical in charter, such as the number of personnel, weapons and equipment, physical mobility, firepower, command organization, logistics, and quality of weapons and equipment."<sup>11</sup> The factor force combat power of Standing Naval Force Mediterranean can be viewed readily through the sheer physical number of assets assigned. However, the basic numbers do not provide a full understanding of what the true capability of this force may be. For example, if a force is inadequately trained, poorly led and equipped, it may be more of a detriment than an

asset to the overall military effort. Conversely, a force properly trained, led, and equipped can be a significant asset and a force multiplier to the Joint Task Force Commander.

Standing Naval Force Mediterranean in the pure sense represents an alliance. "It is the result of a formal agreement between two or more nations for broad, long-term objectives which further the common interests of the members."<sup>12</sup> However, although it represents a standing alliance, STANAVFORMED tends to display the attributes of a coalition force. Challenged with interoperability issues, it is *ad hoc* in nature, units assigned have no long-term consistent NATO training, and unity of command is difficult to obtain. Although operating under NATO command, most of the naval units maintained a close and often conflicting relationship with their own national commands. The following analysis is keyed to Standing Naval Force Mediterranean's participation in Operation Allied Force.

#### INTEROPERABILITY

A wide spectrum of military capabilities existed in STANAVFORMED. Due to the lack of equipment standardization, however, there was a significant imbalance among the technologies each nation employed. Communication suites

varied from nation to nation, hindering command and control.

Basic message routing on the NATO Flagship was cumbersome.

NATO message traffic had to be separated physically from the U.S. message system, which was using the new IT-21 routing equipment. In addition, NATO did not provide the force a common operating picture, which adversely affected the interoperability of the group.

#### ROE

Basic NATO Rules of Engagement (ROE) were established but often misunderstood by the eight nations in Standing Naval Force Mediterranean. Crucial questions, such as the right to take action against forces demonstrating hostile intent, varied by country and situation. Given differing ROE interpretations, ships responded by stating what their national ROE allowed them to do, not what NATO directed. To work around this difference and eliminate any possible risk of improper engagement, ships were assigned sectors compatible with their national ROE procedures.

#### TRAINING

*Standing coalitions should not need to rely on inventiveness and adaptability during conflict.*

*Peacetime training should be designed to engage coalition forces in the most difficult and demanding tasks they may be asked to perform in war and to fathom the weak points that will cause friction under the most trying circumstances. The point is to identify, then eliminate or narrow the seams between forces that could reduce synergy and*

*synchronization. Procedures that require multinational forces to operate seamlessly should be practiced routinely. Because of the complexity of combined operations, the required skills atrophy quickly. Training should reoccur cyclically at the operational and tactical levels.*

*This is essential both to the basis for trust, which will be vital in war, and to identify the abilities and limitations of coalition forces.<sup>13</sup>*

During assignment to STANAVFORMED, ships conducted an intense at-sea training program to smooth out communication and interoperability issues. With naval units rotating in and out every two to four to six months, it became difficult to maintain a high degree of force readiness. This frequency of change sustained the *ad hoc* nature of STANAVFORMED and challenged the development of necessary operational skills to perform basic operations. Each unit brought different levels of training and experience, thus influencing the level at which the force could operate. The issue is the relevance of national training received. The type of training conducted did not match the real world operations that Standing Naval Force Mediterranean was called upon to conduct.

STANAVFORMED rotated the warfare commander assignments weekly. This did not allow any one ship the ability to become proficient in operations. Based on discussions among the eight contributing units, it was clear that the majority

of the naval units had not participated in a NATO exercise and had not operated with another nation during the last year. In spite of the NATO doctrine, each nation relied on its own national directives. The force operated at a basic level and could not advance to an intermediate stage due to training deficiencies.

#### COMMAND AND CONTROL

The most contentious aspect of multinational operations tends to be command and control. There is sensitivity over who will command, and what degree and type of authority the commander will have. In Operation Allied Force, the political leaders of each nation were concerned about the degree of day-to-day control national authorities had over the employment of their own assets. The North Atlantic Council (NAC) directed the military operations in support of the alliance political objectives for Kosovo. Decisions were made by the collective agreement of the nineteen member nations. This restricted the employment of the Immediate and Rapid Reaction Forces.

STANAVFORMED had a command structure that proved awkward and added delays to the execution process. There was a procedure for the transfer of operational control between National and NATO authorities when ships joined and detached. However, even though units were under operational

control of Standing Naval Force Mediterranean, there was a parallel command structure in which the national authorities maintained responsibility for the logistical support of assigned units. Frequently, matching logistical support from eight separate nations to the operational needs of NATO was cumbersome. Having two command and control structures introduced divergent paths of political and military advice, often placing a ship's Commanding Officer at odds with the NATO Commander. To strive for unity of purpose and effort, Commander, STANAVFORMED conducted bi-weekly meetings. Operations were risk adverse and did not reveal the true depth of the issues surrounding command and control.

Conducting a military operation in an alliance or multinational setting is difficult. Effective combined operations, be they under a unified command or based on alliance agreements, require a high degree of interoperability. Without it the risks of erroneously engaging the wrong target are high and unity of effort is nearly impossible.

To remain relevant in the new Europe, "NATO is shifting towards a Combined Joint Task Force (CJTF) concept. This initiative is intended to provide NATO a powerful new organizational concept for responding to crises by rapid deployment of forces."<sup>14</sup> With the increased reliance on

multinational forces, interoperability issues must be minimized. The next section will discuss findings and offer recommendations to improve the operational efficiency and effectiveness of Standing Naval Force Mediterranean.

## **V. CONCLUSIONS AND RECOMMENDATIONS**

*Often a coalition's cohesion will depend on the proportionate sharing of burdens, risks, and credit. All these can be most fairly and satisfactorily apportioned if the total force is able to operate as a single entity... Every improvement in coalition operations that we bring to the battlefield will have an impact on the success of the operation and reduce the human toll for our own forces, as well as every one of our allies. We have the technology and experience to improve coalition warfare.<sup>15</sup>*

### **FINDINGS**

Although Standing Naval Force Mediterranean was not employed in Operation Allied Force as an Immediate Rapid Reaction Force, it still remains NATO's first line of maritime defense in NATO's southern tier. The case of Standing Naval Force Mediterranean reflects contentious discussions among member nations as to whether SNFM's role as an Immediate Rapid Reaction Force is viable given today's threat environment.

STANAVFORMED is truly an *adhoc* arrangement. The frequent shifting of assigned units changed force character,

composition, and scope. This made it very difficult to achieve unity of effort and command. The lack of common fighting doctrine, coupled with interoperability issues, must be weighed by the Operational Commander, when assessing the risks associated with SNFM employment. Given its inherent inefficiencies, Standing Naval Force Mediterranean's military effectiveness was degraded in Operation Allied Force to the point where it was questionable if it could perform the missions for which it was established. Reliance on this multinational alliance raises the possibility that NATO members may agree in general to cooperate, but are less willing in practice to participate in a specific venture. There is no dispute on the political value of Standing Naval Force Mediterranean. A means to build alliance cohesion, it remains an icon of NATO continuity.

Standing Naval Force Mediterranean is ripe for reform, as NATO members look to play a stronger role in European security. With the increase in asymmetrical warfare, Standing Naval Forces bring multi-nationality, flexibility, and regional expertise, and are ideally suited for operations on the lower end of the spectrum, as well as conventional employment. From a political-military point of view, assigning non-traditional missions to STANAVFORMED may

enhance the collective security of the region and legitimize Partnership for Peace. The majority of the nineteen NATO member nations see opportunities for cooperative maritime ventures in which their smaller navies can participate. These conditions reflect the true operating environments in which many of the units will be employed.

NATO is still struggling against Cold War inertia. No one has assessed whether the internal processes of the Alliance are evolving in sync with changes to the external environment. Any one member may veto any proposed action at any time. This may have been appropriate during the Cold War when the use of nuclear weapons was a prime consideration, but not today. NATO must first reorganize to engage the Twenty-First Century. Emphasis needs to be placed on the skillful employment of military forces to attain NATO's strategic and operational objectives. In a significantly different contemporary operating environment, threats may be less visible but are no less lethal. Regional crises will continue to proliferate and NATO will be faced with the dilemma of Standing Naval Force Mediterranean employment.

"NATO's modification of its integrated military structure and adaptation of the Combined Joint Task Force (CJTF) concept is a step in the right direction,"<sup>16</sup> but

reorganization of NATO's military command structure alone is not enough. Facets of operational art must be studied and applied. NATO military staffs must be able to assess critically the situation for the commander, provide detailed planning, and streamline the approval process. They must be trained to develop and execute operational plans for any crisis throughout the spectrum of conflict. Exercise scenarios must be realistic and detailed so that operational planning can be exercised. In addition, training must challenge commanders and staff officers to use existing approved operational plans appropriate to a specific situation. This will require a hard look at NATO internal processes and their applicability to employment of the assets assigned to NATO.

The Joint Task Force Commander will continue to be challenged with accomplishing warfare tasks, redirecting efforts, and fostering coordination to maintain operational integrity. Overshadowing this is the criterion to maintain impartiality while building consensus among widely diverse players. Encouraging and obtaining unity of effort at the military, political, and cultural levels remains a major challenge. Given the dynamic nature of multinational operations and the challenge to integrate forces to balance strengths and national agendas, the question of how to best

employ Standing Naval Force Mediterranean remains unanswered. In 1993, initiatives were implemented to develop operational level multinational maritime doctrine (MMD) to address the coordination and planning of multinational forces. "The intent of the MMD project is to enhance mutual understanding between world navies and contribute to the success of cooperation at sea through the availability of creditable maritime doctrine and procedures."<sup>17</sup> Navy Warfare Development Command (NWDC) has taken the lead in developing an operational level doctrine document, *Multinational Maritime Operations (MMOPS)*, as a mechanism to attain compatibility and consistency among NATO and world navies. "Distributed in 1996, thirty-two nations, Supreme Headquarters Allied Powers Europe (SHAPE) and Supreme Allied Commander Atlantic (SACLANT) have tested it, and have reported its worldwide utility."<sup>18</sup> It is anticipated that this doctrine, after revision, will be distributed for implementation by NATO and world navies. This common body of doctrine for multinational operations will make a positive impact in minimizing interoperability issues for Standing Naval Force Mediterranean.

The main lesson learned from this study is that, interoperability issues will always be present in multinational operations. It is the magnitude of the

underlying elements of interoperability that must be addressed to ensure operational effectiveness. While there is no cookbook approach to multinational operations, there are some commonalities that can be addressed to prepare better for contingency operations. Issues of interoperability, common doctrine, and training need to be addressed to minimize the associated risk of operating in a multinational environment. Differences in culture, language, technology, and doctrine oppose unity of effort. Common, agreed upon procedures and a shared understanding of the battle environment will provide a basis for continuity of effort. "Procedures that require multinational forces to operate seamlessly should be practiced routinely."<sup>19</sup>

#### RECOMMENDATIONS

*Since the beginning of this century, there has been a strong common thread in the involvement of American forces in combat. Almost every time military forces have deployed from the U.S. it has been a member of - most often to lead - coalition operations.*<sup>20</sup>

American military forces have been employed in various media throughout history. Rarely has the United States committed forces unilaterally. The U.S. National Security Strategy and the expanding U.S. global interests dictate that our military forces be engaged in alliance and coalition operations. With the reduction of overseas ground

base presence, naval forces have increasingly played a critical role in establishing solidarity with our Allies. The debate continues regarding how to employ Standing Naval Force Mediterranean to support the twenty-first century threat environment.

Based on the evolving role in Europe, NATO must assess the use of its maritime forces. There is no question that Standing Naval Force Mediterranean could be flexible, self-sustaining, mobile, and ready to operate. Able to deter aggression and influence unstable situations, SNFM should be retained. It offers presence without occupation and deterrence without commitment to complement NATO's diplomatic efforts. The multinational potential of Standing Naval Force Mediterranean outweighs its costs, but without careful planning and preparation this maritime asset could be a critical weakness.

The findings and conclusions of this research paper must be considered preliminary. The recommendations are intended to suggest potential areas where beneficial changes may be implemented to provide a more capable force (Standing Naval Force Mediterranean) for the Task Force Commander to employ. However, further study is required to evaluate their operational feasibility within the NATO command

structure. What follows is a list of the recommended changes:

1. Shift the Immediate Rapid Reaction Forces Maritime (IRF(M)) into the Combined Joint Task Force (CJTF) structure.
2. Conduct a review of the mission of Standing Naval Force Mediterranean to include a feasibility study of the ability to conduct "out-of-area" non-traditional operations that include peace support operations, maritime interdiction operations (MIO), and non-combatant evacuation operations (NEO).
3. Develop a NATO Force Liaison Group (NFLG) to workup, train, advise, and assess standing force elements.
4. Adopt the operational level doctrine, Multinational Maritime Operations (MMOPS), developed at Naval Warfare Development Center, Newport Rhode Island as a baseline for future SNFM operations.
5. Establish alliance-training exercises. Training should be tailored and address real world operations. A valid assessment of the training status and compatibility of national forces should be undertaken to create a realistic training plan, and reported to the Joint Task Force Commander.
6. Develop exercises for Standing Naval Forces that are similar to the Joint Task Force Exercises (JTFX) that US battle groups conduct.
7. Educate and train NATO staff planners and action officers in the application of operational art. Establish a cross training program between the CINC staff planners and NATO planners.
8. Establish measures of effectiveness, and conduct a semi-annual review of the standards for both equipment and doctrine to assess their interoperability and feasibility in today's operating environment.

## NOTES

<sup>1</sup> Chairman of the Joint Chiefs of Staff, "National Military Strategy of the United States of America." (Washington, DC: September 1997), 13.

<sup>2</sup> Michael E Firlie "A new approach: NATO Standing Combined Joint Task Forces". Joint Force Quarterly, (Autumn/Winter 1999-2000): 32.

<sup>3</sup> Mark O. Schissler, "Coalition Warfare: More Power or More Problems?" (Unpublished Research Paper, U.S. Naval War College, Newport, RI: 1993), 2.

<sup>4</sup> North Atlantic Treaty Organization, NATO Allied Joint Doctrine (AJP-01(A)). (Brussels: NATO Information Service, 1998), 1-3 - 1-4.

<sup>5</sup> Ibid. , 5-1 – 5-2.

<sup>6</sup> Message from Secretary of Defense William S. Cohen and Chairman of the Joint Chiefs of Staff Henry H. Shelton, Report to Congress: "Kosovo/Operation Allied Force After Action Report" (31 January 2000), 1.

<sup>7</sup> Ibid. , xvii.

<sup>8</sup> Ibid. , 7-8.

<sup>9</sup> NATO, NATO Allied Joint Doctrine, 1-3.

<sup>10</sup> Joint Chiefs of Staff, Joint Doctrine for Multinational Operations, Joint Pub 3-16 (Washington, DC: 5 April 2000), I-I.

<sup>11</sup> Milan N. Vego, NWC 1004, Operational Warfare, (Newport: U.S. Naval War College, 2000), 85.

<sup>12</sup> Joint Chiefs of Staff, vii.

<sup>13</sup> Robert W RiCassi, "Principles for Coalition Warfare." Joint Force Quarterly, (Summer 1993): 68.

<sup>14</sup> Firlie, 34.

<sup>15</sup> RiCassi, 58.

<sup>16</sup> Firlie, 32.

<sup>17</sup> U.S. Navy Warfare Development Command, "Charter For Multinational Maritime Doctrine Project". <[http://www.nwdc.navy.mil/command/dcctrine/MMOps/2\\_chart.asp](http://www.nwdc.navy.mil/command/dcctrine/MMOps/2_chart.asp)> [16 May 2001]

<sup>18</sup> Ibid.

<sup>19</sup> RiCassi, 71.

<sup>20</sup> Ibid. , 68.

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